

DATE CONCLUDED:		
INVESTIGATOR:	SIGNATURE:	DATE:



File: DSI-33260

December 12, 2016

REGISTERED MAIL

Western Forest Products Inc.
118-1334 Island Highway
Campbell River, British Columbia
V9W 8C9

Dear Sir or Madam:

**Re: Contravention Determination and Notice of Penalty under Section 82(4) of the
*Forest and Range Practices Regulation (FRPA)***

This is further to my letter dated June 1, 2016, and the Opportunity to Be Heard meeting (OTBH) which took place on October 14, 2016, respecting the alleged contravention of FRPA Section 82 (4).

Authority

The Ministry of Forests, Lands and Natural Resource Operations (FLNRO) has delegated to me, under Section 120.1 (1) of FRPA, the authority to make determinations with respect to contraventions and administrative penalties under Section 71 of FRPA.

Legislation

Section 82 (4) of FRPA states:

82 (4) If a road deactivated under this section is a road that was used under the authority of a road permit associated with, or a cutting permit issued under, a tree farm licence, the holder of the tree farm licence must maintain the stability of each part of the road that was deactivated.

Section 82 (1) of FRPA sets out what must be done to deactivate a road. It states the following:

- 82 (1) A person who deactivates a road must do the following:
- a) barricade the road surface width in a clearly visible manner to prevent access by motor vehicles, other than all-terrain vehicles;

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- b) remove bridge and log culvert superstructures and stream pipe culverts;
- c) remove bridge and log culvert substructures, if the failure of these substructures would have a material adverse effect on downstream property, improvements or forest resources;
- d) stabilize the road prism or the clearing width of the road if the stabilization is necessary to reduce the likelihood of a material adverse effect in relation to one or more of the subjects listed in section 149 (1) of the Act.

Issues

The following issues are relevant to the case:

1. Has there been a contravention of section 82 (4) of FRPA?
2. Do any of the defences of due diligence, mistake of fact or officially induced error apply?
3. If there has been a contravention, what amount of penalty, if any, is appropriate?

After considering all the evidence presented to me, and the information presented below, it is my determination that Western Forest Products Inc. (WFP) did not contravene Section 82 (4) of FRPA.

The rationale for my determination is set out below.

Background

Approximately twelve years ago WFP's predecessor constructed approximately two kilometres of road known as Fauna 900 road system within Tree Farm Licence 44 located on Southern Vancouver Island near Port Alberni. WFP is the current holder of the TFL 44 and as such is responsible for Fauna 900 under road permit (RP) R07655.

In May 2015, a landslide originating from Fauna 900 was reported. Record rainfall was recorded at a nearby weather station in December 2014. The landslide removed forest soil, including planted seedlings, stumps and other vegetation cover. The debris flowed down slope and scoured the unnamed creek channel impacting additional area of forested slope through forest block and portions of an old-growth stand above the creek. In total there were four depositional zones, the last occurring 600 metres upstream from the fish-bearing Little Nitinat River.

At the OTBH and as documented in Compliance and Enforcement's (C&E) OTBH binder, Natural Resource Officer (NRO) Brent Stoll presented the following evidence and allegations.

C&E's Evidence

- A copy of the 2002 original road construction prescription prepared by Madrone Environmental Services Ltd. which recommended that full bench end haul construction be undertaken along the section of Fauna 900 where the landslide subsequently occurred, but this recommendation was not followed by WFP's predecessor when the road was constructed nor was it followed in October 2005, when it was partially deactivated by another one of WFP's predecessors.

- Documentation indicating that WFP maintains responsibility for Fauna 900 under road permit.
- Mr. Stoll statement: “Although Fauna 900 is a “Wilderness Road”, WFP is required to maintain the stability of the road prism and to ensure no material adverse effects”.
- In July 2002, prior to this section of new road being built, a Terrain Hazard Assessment was completed which recommended full bench haul construction along certain sections of the road to address terrain stability hazard and potential for landslides impacting creeks and the Little Nitinat River below.
- In October 2005, after timber harvesting was completed, WFP’s predecessor removed culverts; armoured water bars; and cleaned and grass seeded ditches of Fauna 900, but did not undertake full slope pull back.
- On May 11, 2006, WFP acquired TFL 44 and associated road permits including Fauna 900.
- On May 1, 2015, WFP discovered one of the deposition zones of the landslide originating from Fauna 900 on the Carmanah mainline and reported it to FLRNO on May 19, 2015.
- On May 6, 2015, and prior to be informed by WFP of the landslide, FLRNO staff while conducting FREP field work discovered the landslide, documented its extent and notified FLRNO’s C&E team who began investigating the incident.
- On May 7 and 13, 2015, NRO Brent Stoll inspected the site, and photographed and documented the slide and debris torrent on Fauna 900, including several tension cracks indicating the road continued to have stability issues which would likely result in further landslides if not treated.
- A copy of the May 5, 2015, report prepared by Jeff Shatford, a Registered Professional Biologist (RP Bio) with FNLRO, who discovered the landslide during a routine FREP monitoring of a nearby cut block. The report documents the point of origin of the landslide at Fauna 900 and its path as seen from the Carmanah Mainline below. Mr. Shatford notes:
 - The landslide removed approximately 400m² (20x20m) of forest soil to a depth of approximately 1 metre, including planted seedlings, stumps and other vegetation cover.
 - The debris flowed down slope and scoured the unnamed creek channel impacting an additional 100X10 m area of forested slope through forest block and portions of an old-growth stand above the creek.
 - “Given the extent of the debris flow, sediments and gravel would have been carried into the Little Nitinat River, with potential to impact Coho Salmon and cutthroat habitat.”
- On September 8, 2015, NRO Brent Stoll visited the site with FLRNO regional geoscientist, Tom Millard, M.Sc., P.Geo. Several tension cracks and overburden along Fauna 900 were photographed and documented along with the debris path of the landslide which followed a non-fish bearing tributary stream. Mr. Millard report noted that the landslide head scarp originated in road fill material on a 75% percent slope. Furthermore tension cracks continued to be evident in the fill slopes along Fauna 900.
- On September 21, 2015, after being notified of C&E’s investigation, WFP visited the initiation point of the slide for the first time. Kevin Hunter, RFT, conducted a road inspection for WFP that indicated that some fill slope pullback may be required.

- On September 24th 2015, WFP again visited the initiation site, this time with a terrain specialist from Madrone Environmental Services Ltd who prescribed remedial pull back work.
- On September 28th, NRO Stoll interviewed WFP Divisional Manager Jim Muress and Forester, Erin Badesso to determine the system WFP used for inspecting wilderness roads and what actions WFP had taken to ensure Fauna 900 had a stable road prism after it was deactivated. They said WFP generally does not inspect roads after they are deactivated and that WFP had likely not completed a road inspection of Fauna 900 since acquiring it in 2006.
- On October 28, 2015, under contract by WFP, Doug McCorquodale, RPBio for Pacificus Biological Services Limited, undertook a field examination of the channel conditions within the unnamed tributary of the Little Nitinat River to determine if a slope failure may have resulted in serious harm to fish habitat.
- On November 19th, 2016, Mr. Millard in an internal memo to NRO Brent Stoll documented his assessment of the landslide at Fauna 900. Mr. Millard concluded: “Although it is possible, or even likely, that the landslide initiated in a large storm event, the construction a fill slope on a 75% slope makes it very likely that a slide would initiated at some point after the road was constructed”. He further observed: “During our site assessments, several sections of the road were noted to display tension cracks parallel to the road alignment, an indicator of unstable road fill material. If left unmanaged, these unstable road fills can lead to landslides.”
- In November 2015, WFP undertook fill slope pullback of Fauna 900.
- On November 27, 2015, Mr. McCorquodale concluded in his memo to s.22 of WFP: “it is very unlikely that the event resulted in any serious physical disturbance to the Little Nitinat River... {And} it is also unlikely that this event caused serious harm to fish and fish habitat within the Little Nitinat River...”
- On January 8, 2016, s.22 sent NRO Stoll an email stating that one of WFP’s silviculture contractors recalled walking to the end of Fauna 900 in 2011 when he was conducting surveys. The contractor had no recollection of seeing tension cracks along the road and it was not mentioned in his notes. If there were tension cracks the contractor said he would have made note of them on his work map as that was his standard practice.
- In that same email s.22 shared with NRO Stoll a report WFP commissioned Doug McCorquodale, RP Bio of Pacificus Biological Services, who found that it was possible the event resulted in elevated turbidity levels during and immediately following the debris torrent, but that it was unlikely the landslide caused serious harm to fish or fish habitat.

C&E’s Allegations

- The landslide was the result of WFP’s failure to maintain the stability of the Fauna 900 road as per section 82(4) of the *Forest Act*.
- WFP took action to address the landslide at Fauna 900 only after receiving notice from C&E that the matter was under investigation.
- WFP failed to ever inspect Fauna 900 and that routine inspections serve as an early warning system for potential future issues as well a method of documenting the company’s due diligence.
- Fauna 900 is a deactivated road and therefore Section 82(4) of the *Forest Act* applies.

At the OTBH attended by WFP representatives Paul Nuttall, Manager of Forest Practices and Planning, s.22, and Will Sloan, Certification Coordinator and in a written submission to me from WFP representative Alyce Harper dated September 16, 2016, and a follow up email from Mr. Nuttall dated October 27, 2016, WFP presented the following evidence and assertions.

WFP's Evidence

- The former licensee constructed Fauna 900 over 14 years ago and undertook various deactivation works over 12 years ago; more than two years prior to WFP acquiring TFL 44.
- The former licensee also retained Charles R. MacDonald to prepare a report subsequent to the various deactivation works being completed on Fauna 900. Mr. MacDonald concluded after a field review that the road was stable and that the hazard assessment for the road was low. He did not prescribe any fill slope pull back but noted that although this work would likely reduce the potential for slides and erosion, that these activities would not completely eliminate the hazard.
- Since acquiring TFL 44 in 2006, WFP has conducted several silviculture surveys in the area of Fauna 900 and during the course of these surveys road observations were reported to WFP noting windfall blocking Fauna 900 but no other issues (July 2006, July 2007, May 2008, August 2011). WFP's burning crew also was working in the area in October 2014 and did not observe any evidence of a slide.
- Besides the observations noted above by silviculture surveyors and the burning crew, WFP had planned to undertake its first formal road inspection of Fauna 900 in July 2016. The timing of this inspection was based on work WFP did in July 2013 where Fauna 900 road was ranked as a moderate risk for delivering sediment and moderate fill slope stability hazard and assigned an initial inspection interval of 36 months.
- Doug McCorquodale's findings that it was possible the landslide event resulted in elevated turbidity levels during and immediately following the debris torrent, but that it was unlikely the landslide caused serious harm to fish or fish habitat.

WFP Assertions

- Fauna 900 is not a deactivated road, but rather is a wilderness road as defined under Section 81 of FPPR.
- Fauna 900 was not barricaded and stabilization of the road prism was not necessary to reduce the likelihood of a material adverse effect.
- The decision to maintain or deactivate a road permit road in TFL 44 is determined at WFP's sole discretion as there is no legal requirement to deactivate a road.
- WFP tends not to deactivate roads in TFL 44 to the prescribed requirements as set out in Section 82 of the *Forest and Range Practices Regulation* (FPPR) in order to address public and stakeholder interests in maintaining access across the management unit, where ever possible.
- The deactivation prescription and work completed by the former licensee reflect the objective of maintaining access on Fauna 900.
- C&E failed to establish that Section 82(4) of FPPR is applicable to Fauna 900 or, if it is, that WFP contravened the law.

- Even if its position wasn't accepted that WFP didn't contravene the law, that it was duly diligence to prevent any contraction as provided in Section 72 of the *Forest and Range Practices Act* (FRPA) by undertaking the following:
 - Employing a forest management and planning software program referred to as "CENFOR" that allows WFP to track, manage and report on road construction, maintenance, and deactivation along with other forest activities;
 - Undertaking road maintenance inspections of specific roads within TFL 44 every year since 2009 with a significant portion of these inspections taking place in high landslide frequency zones;
 - Conducting final cut block inspections once harvesting is complete which includes observing and recording the conditions of the roads in CENFOR;
 - Conducting post-harvest inspections of cut blocks within six months after completion of harvesting activities which includes a review of road systems related to the cut blocks, with noted items entered into CENFOR;
 - Conducting and recording inspections of deactivated roads, prior to, during, and after deactivation and recording any issues observed in CENFOR;
 - Conducting overview flights after major storm events to examine road conditions, and, to the extent damage is identified, arranging for ground crews to visit the site for further examination;
 - Communicating daily with its contractors, who as a requirement of WFP's Standard Operating Procedures for Road Users, are to observe and report any road-related issues that they come across in the field to WFP, including the nature and location of the road issue or hazard;
 - Requiring all employees and contractors covered by WFP's environmental management system (certified to ISO 14001 Environmental Management Systems Standards) to follow WFP's Common Standard Operating Procedures that requires, among other things, an employee or contractor to stop work and notify a supervisor if they encounter previously unidentified areas of slope instability or potential problems that may result in adverse environmental impacts;
 - Including provisions in its contracts to immediately inform WFP of any work that may be required to avoid non-compliance with applicable legislation, or WFP's policies, procedures, and regulations related to safety, the environment and compliance with forestry legislation;
 - Undertaking field inspections of roads in TFL 44 since 2012 in accordance with a risk-based system developed largely on earlier work of WFP contractor Glynnis Horel, P. Eng. The system assigns risk based inspection intervals for each road segment commensurate with the likelihood and potential magnitude of harm; and,
 - Conducting road inspection and maintenance following standard operating procedures developed in October 2014 to provide further guidance and training on road inspections.

Summary of the evidence and findings of fact

- WFP is the holder of TFL 44 and Fauna 900 road permit where the landslide occurred.
- The date of the landslide is unknown, but was discovered in early May 2015 by both WFP and FLNRO independently of one another.

- On December 9 and 10, 2014, and prior to the landslide event, a large storm passed through the area with the highest recorded daily participation in the 16 year period of the Summit weather station.
- The landslide was caused by a failure of the Fauna 900 fill slope.
- The landslide followed the path of a non-fish bearing tributary stream and produced four depositional zones, with the last one located 600 metres upstream from the Little Nitinat River.
- There is no record of Fauna 900 ever being barricaded prior to the landslide.
- Fauna 900 road was never deactivated.

Do the facts support a finding of contravention of FRPA Section 82(4)?

I conclude that the facts set out above do not support a finding that WFP contravened section 82(4) of FPPR because that section only applies if a road has been deactivated. Fauna 900 road was not deactivated, but rather is a wilderness road as per FPPR section 81, and confirmed by both WFP and C&E in their separate written submissions to me. Specifically, the road surface width of Fauna 900 was not barricaded in a clearly visible manner to prevent access by motor vehicles, other than all-terrain vehicles as required under Section 82(1)(a). In fact, it was not barricaded at all. While C&E at the hearing said “Fauna 900 looked and smelled like a deactivated road” because culverts had been removed and partial deactivation had occurred, a road cannot be considered deactivated unless it meets all the requirements as specified in FPPR 82(1)(a-d), which includes barricading the road.

I further conclude WFP continues to be responsible for the maintenance of Fauna 900 as a wilderness road under a road permit which means WFP must continue to ensure that the structural integrity of the road prism and clearing width are protected and the drainage systems of the road are functioning to the extent necessary to ensure there is no material adverse effect on a forest resource.

Do any defences apply?

As I have found no contravention, there is no need to address the defences.

Is a penalty appropriate and if so how much?

As I have found no contravention there is no need to address the penalty.

Opportunities for review and appeal

If WFP has new information that *was not available* at the time I made this determination, WFP may request a review of my determination on the basis of this new information. A request for review must be in writing, must be signed by a representative of WFP, and must contain:

- a) WFP’s name and address; and the name of the person, if any, making the request on WFP’s behalf;
- b) the address for serving a document on WFP or the person acting on its behalf;
- c) the new evidence that was not available at the time this determination was made; and,
- d) a statement of the relief requested.

This request should be made to me at 4885 Cherry Creek Road, Port Alberni, BC, V9Y 8E9 and I must receive it no later than three weeks after the date of this notice of determination is given or delivered to you. If WFP request a review, WFP may appeal the decision made after the completion of the review to the Forest Appeals Commission.

The provisions governing reviews are set out in Section 80 of the FRPA and in the Administrative Review and Appeals Procedure Regulation. Please note the **three week time limit** for requesting a review.

Alternatively, if WFP disagrees with this determination, it may appeal directly to the Forest Appeals Commission.

The appeal request must be signed by WFP or its representative, and must contain:

- a) WFP's name and address; and the name of the person, if any, making the request on WFP's behalf;
- b) the address for serving a document on WFP or the person acting on WFP's behalf;
- c) the grounds of the appeal;
- d) a statement of the relief requested; and,
- e) a copy of this determination.

The Forest Appeals Commission must receive the appeal **no later than 30 days** after the date of this notice of determination is given or delivered to you.

The provisions governing appeals are set out in Section 82 through 84 and sections 140.1 through 140.7 of FRPA, and in the Administrative Review and Appeal Procedures Regulation. To initiate an appeal, you must deliver a notice of appeal, together with the requisite supporting documents, to the Forest Appeals Commission. A notice of appeal may be delivered to the following address:


The Registrar, Forest Appeals Commission
PO Box 9425 Stn. Prov. Govt.
Victoria, British Columbia
V8W 9V1

Please note the **30 day limit** for delivering a notice of appeal.

Determination is stayed pending review or appeal

Under Section 78 of the FRPA, my contravention determination and penalty determination under Section 71 are stayed until WFP has no further right to have this determination reviewed or appealed, after with time they take immediate effect.

Yours truly,


Digitally signed by Rhonda (Morris) Coleman
DN: cn=Rhonda (Morris) Coleman, o=Ministry
of Forests, Lands and Natural Resources,
ou=South Island Natural Resource District,
email=Rhonda@gov.bc.ca, c=CA
Date: 2016.12.12 16:19:47 -08'00'

Rhonda Morris
District Manager
South Island Natural Resource District, West Coast Region

Pc. Compliance and Enforcement Branch, HQ
Forest Practices Board (Mark Haddock)



INSPECTION REPORT



RECORD ID: 015632

IDIR\ s.15

02:48 Oct 30, 2015

Natural Resource Officer:

Brent Stoll

Region: West Coast

Field Unit: South Island

Date of Inspection:

Jun 25, 2015

Client:

WESTERN FOREST
PRODUCTS INC.,
CORPORATE OFFICE

In Attendance:

Compliance Status:

Alleged Non-Compliance

Client Contact Information:

118 - 1334 ISLAND HIGHWAY,,
CAMPBELL RIVER, BC, CANADA
V9W8C9

Latitude:

49.32923

Longitude:

-125.154168

Location Description:

TFL 44 CP 771 Block 351307

Primary Tenure/Authorization:

TFL 44 CP 771 Block 351307/NRIS

Secondary Tenure/Authorization:

Alleged Non-Compliance Summary:

aNC#	Estimated Incident Date	Parent Act	Act/Regulation	Section	Description	Action Taken
2665	Jun 18, 2015	Forest and Range Practices Act	Forest and Range Practices Act	52 (1)	Cut, damage or destroy Crown timber without authority	Enforcement Action

Warning Ticket:

ERA Case #:

33390

Description and Comments:

Unauthorized harvest. Licensee accepted responsibility for lack of due diligence. Area +/- 0.5 ha. VT issued. See file for notes and photos.

Natural Resource Officer: [Brent Stoll]

Signature: X

I certify that this inspection conforms to Ministry compliance procedures.

Sent to:

118 - 1334 ISLAND HIGHWAY,,
CAMPBELL RIVER, BC, CANADA
V9W8C9

Attachments and Comments:	Delivered via:	
	Email: <input checked="" type="checkbox"/>	Fax: <input type="checkbox"/>
	Mail: <input type="checkbox"/>	Hand Delivery: <input type="checkbox"/>

DSI-33390

TFL 44 CP 771 BLK 351307 UH

2015-06-18 @1530 hrs

Phone interview with Lance WINDGRAVE

Western Forest Products

- Heli block 351309 is directly above 351307. This block was logged first. There is a TLA between the 2 blocks.
- WINDGRAVE indicated there was a blank area between the 2 blocks on the map. This did not show as a TLA. This is the same map that was issued to the conventional logging contractor Fall River.
- Fall River contractor contacted WINDGRAVE saying there was wood between their block and the heli block and should they pick it up. WINDGRAVE gave the go ahead assuming this was felled wood. In fact this wood was standing timber and was a TLA between the 2 blocks.
- 0.2 ha of a TLA was felled without authority under the cutting permit.
- WINDGRAVE said he should have looked at the heli harvest map and by the time he got out there it was too late.
- The error appears to have come down to a miscommunication.



BRITISH COLUMBIA

Offence Act

**VIOLATION
TICKET**

AH75120255

ISSUED TO:

SURNAME OR CORPORATE NAME Western Forest Products Inc.							
GIVEN NAMES (OR CORPORATE NAME CONTINUED)							
<input type="checkbox"/> YOUNG PERSON							
PROV. / STATE	DRIVERS LICENCE NUMBER	PRODUCED	EXPIRY	GENDER	YYYY	MM	DD
				M / F			
ADDRESS 3500 Harbour Road							
<input type="checkbox"/> CHANGE OF ADDRESS							
CITY	PROV. / STATE	POSTAL / ZIP CODE					
Port Alberni	BC	V9Y 3G3					

THE ENFORCEMENT OFFICER SAYS THAT HE OR SHE HAS REASONABLE AND PROBABLE GROUNDS TO BELIEVE, AND DOES BELIEVE, THAT

THE ABOVE NAMED, AS: ☐ DRIVER ☐ CYCLIST ☐ OWNER (Per Section 63(2) of the Motor Vehicle Act) ☐ PEDESTRIAN ☐ PASSENGER ☒ OTHER **Licensee**

ON OR ABOUT **2015** **06** **18** AT THE TIME OF **15 30** (24hr Clock)

ON **Tree Farm License 44 CP771, Block 351367**

AT OR NEAR **Port Alberni** IN THE PROVINCE OF BRITISH COLUMBIA

DID COMMIT THE OFFENCE(S) INDICATED, UNDER THE FOLLOWING ACT OR ITS REGULATIONS:

☐ (MVA) MOTOR VEHICLE ACT ☐ (WLA) WILDLIFE ACT ☐ (LCA) LIQUOR CONTROL & LICENCING ACT
☐ (MCA) MOTOR CARRIER ACT ☐ (FAA) FIREARM ACT ☐ (TCH) TRANSIT CONDUCT & SAFETY REGS.
☐ (CTA) COMMERCIAL TRANSPORT ACT ☒ OTHER (SPECIFY) **Forest and Range Practices Act**

DESCRIPTION OF OFFENCE(S)	ACT / REGS	SECTION	TICKETED AMOUNT
Cut, remove, damage or destroy Crown timber without Authority	FRPA <input checked="" type="checkbox"/> ACT <input type="checkbox"/> REGS	52	\$173.00
	<input type="checkbox"/> ACT <input type="checkbox"/> REGS		\$
	<input type="checkbox"/> ACT <input type="checkbox"/> REGS		\$

* THIS TICKETED AMOUNT CONSISTS OF THE FINE FOR THE ALLEGED OFFENCE AND A 15% VICTIM SURCHARGE LEVY.

INVOLVING THE VEHICLE BEARING LICENCE PLATE	PROV. / STATE	PLATE NUMBER	NSC PUJ	NSC NUMBER

REGISTERED OWNER NAME

VEHICLE MAKE	TYPE	COLOUR	YEAR	ACCIDENT Y / N

IF YOU WISH TO DISPUTE ANY ALLEGATIONS OR FINE AMOUNT ON THIS VIOLATION TICKET, YOU MAY DELIVER A NOTICE OF DISPUTE TO:

4070 8th Ave, Port Alberni, BRITISH COLUMBIA

OR MAIL OR DELIVER A NOTICE OF DISPUTE AS DESCRIBED ON THE REVERSE.

PROVINCIAL COURT HEARING LOCATION	DATE OF SERVICE
Port Alberni	2015 07 07

ENF. OFFICER'S #	ORGANIZATION / DETACHMENT / LOCATION
1627	MFLNKO / Port Alberni

SHADED AREAS OF THIS TICKET ARE NOT PART OF THE OFFENCE CHARGED

ENFORCEMENT OFFICER'S SIGNATURE **[Signature]**

IF THE ALLEGATIONS OR FINES ARE NOT DISPUTED (SEE REVERSE) WITHIN 30 DAYS, THIS TICKET WILL BE TREATED AS NOT DISPUTED, YOU WILL BE DEEMED TO HAVE PLEADED GUILTY TO THE ALLEGED OFFENCE(S) AND TO OWE THE CROWN THE TICKETED AMOUNTS. YOUR SIGNATURE INDICATES YOU HAVE RECEIVED THIS TICKET AND IS NOT AN ADMISSION OF GUILT.

I HEREBY ACKNOWLEDGE RECEIPT OF A COPY OF THIS VIOLATION TICKET

ALLEGED OFFENDER'S SIGNATURE **[Signature]**

ENFORCEMENT AGENCY'S COPY